

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 9/7/2020
2. Deadline for first request for production of documents and first request for interrogatories: 9/28/2020
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted in a second set of interrogatories under the federal rules for: plaintiff(s) 10; defendant(s) 10
3. Date for completion of any joinder of additional parties and amendment of the pleadings: 10/8/2020
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) TBD; defendant(s) TBD
4. Number of depositions by plaintiff(s) of: parties 10; non-parties 10
5. Number of depositions by defendant(s) of: parties 5; non-parties TBD
6. Date of status conference (joint status report due two business days in advance): 11/30/2020
7. Date for completion of factual discovery: 01/25/2021
8. Are expert witnesses needed? Yes X No
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical X; non-medical TBD
- 8(b). Date for completion of those expert reports: 2/22/2021
- 8(c). Number of expert witnesses, if any, of defendant(s): medical X; non-medical TBD
- 8(d). Date for completion of those expert reports: 03/22/2021
9. Date for completion of expert discovery: 03/22/2021
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): 04/26/2021
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: Summary Judgment
04/05/2021

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: Summary Judgment
04/25/2021
13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes X No
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes No x
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes No X